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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STANDARD TANKERS BAHAMAS
LIMITED,

08 Civ 10561 (JSR)

Plaintiff,

- against-

INDUSTRIAL CARRIERS, INC.,
CLASSIC MARITIME, INC. and
JANE and/or JOHN DOE,

NOTICE OF MOTION

Defendants.

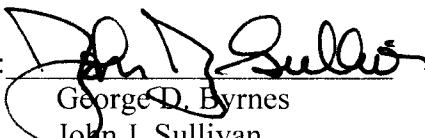
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PLEASE TAKE NOTICE that plaintiff Standard Tankers Bahamas Limited (“Standard”), by and through its attorneys Hill Rivkins & Hayden LLP, hereby moves before the Honorable Jed S. Rakoff, U.S.D.J., U.S. Courthouse, Room 14B, 500 Pearl Street, New York, NY 10007, for entry of an Order in the form submitted herewith, granting Leave to Standard to Make Deposit in Court pursuant to Fed. R. Civ. P. 56 and 67, respectively, and for summary judgment dismissing Standard from this action upon such deposit, and for such other and further relief as this Court deems just and proper. Any papers in opposition to this motion should be submitted and served in accordance with Local Civil Rule 6.1(a).

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Plaintiff shall rely upon this Notice of Motion, its supporting Memorandum of Law, and the declarations of John J. Sullivan and Scott Santiago and supporting exhibits.

Dated: New York, New York
May 20, 2009

HILL RIVKINS & HAYDEN LLP
Attorneys for Plaintiff

By: 
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